

**Remarks**

Entry of the above-noted amendments, reconsideration of the application, and allowance of all claims pending are respectfully requested. By this amendment, claims 1-3, 6-10, 14, 20, 28, and 30-31 are amended. These amendments to the claims constitute a bona fide attempt by applicants to advance prosecution of the application and obtain allowance of certain claims, and are in no way meant to acquiesce to the substance of the rejections. The specification has been amended to correct typographical error. Support for the amendments can be found throughout the specification (e.g., paragraphs 29-30 and 35-38), figures (e.g., FIGS. 1-2 and 6-7), and claims and thus, no new matter has been added. Claims 1-31 are pending.

**Claim Rejections - 35 U.S.C. §§ 102 and 103:**

Claims 1-9, 11-14, and 17-31 are rejected under 35 U.S.C. § 102(b) as being anticipated by Kan et al. (U.S. Patent No. 6,250,727; "Kan"). Claims 15 and 16 are rejected under 35 U.S.C. § 103(a) as being obvious over Kan in view of Jansen (U.S. Patent No. 6,667,889). These rejections are respectfully, but most strenuously, traversed.

It is well-settled that there is no anticipation unless (1) all the same elements are (2) found in exactly the same situation and (3) are united in the same way to (4) perform the identical function. Since the Office Action's citations to each of the applied references is missing at least one element of each of applicants' independent claims, applicants respectfully submit that the claimed invention is not anticipated by the Office Action's citations to the applied references, as further discussed below.

For explanatory purposes, applicants discuss herein one or more differences between the Office Action's citations to the applied references and the claimed invention with reference to one or more parts of the applied references. This discussion, however, is in no way meant to

acquiesce in any characterization that one or more parts of the Office Action's citations to the applied references correspond to the claimed invention.

Applicants respectfully submit that the Office Action's citations to the applied references do not teach or suggest one or more elements of the claimed invention. A careful reading of the Office Action's citations to the applied reference fails to teach or suggest, for example, the one or more mounting pins that are directly mounted on the circuit board and connect the circuit board with the chassis, as recited in applicants' independent claim 1.

Kan discloses (column 2, lines 8-23) the motherboard tray 8 with the pair of right-angled tabs 52, the fixing tabs 56, the three flanges 58, and the flake 64:

The mother board tray 8 defines a plurality of through holes 46 therein and forms a plurality of circular protrusions 48 thereon. Each protrusion 48 defines a central hole 50. A pair of right-angled tabs 52 extends from a front edge of the mother board tray 8. Each tab 52 forms a cutout 54 in a distal end thereof. Four fixing tabs 56 perpendicularly extend from a rear edge of the mother board tray 8 for insertion into the receiving recesses 28 of the stepped wall 24. Three flanges 58 are respectively formed between the fixing tabs 56 for abutting against the stepped wall 24 of the rear panel 16. Each flange 58 defines a hole 60 corresponding to the screw hole 30 of the stepped wall 24. A pair of cutouts 62 is defined a bottom edge of the mother board tray 8 corresponding to the brackets 6. A flake 64 is formed in each cutout 62. Each flake 64 is crimped to form a bore 66 at a distal end thereof for rotatably receiving the corresponding shaft 42.

The motherboard tray 8 fails to disclose, *inter alia*, a circuit board. Simply missing from the Office Action's citation to Kan is any mention of the one or more mounting pins that are directly mounted on the circuit board and connect the circuit board with the chassis, as recited in applicants' independent claim 1.

So, the Office Action's citation to Kan fails to satisfy at least one of the limitations recited in applicants' independent claim 1.

The shortcomings of the Office Action's citation to Kan relative to certain elements of the claimed invention have been discussed above. The Office Action proposes a combination of the citation to Kan with a citation to Jansen. However, the Office Action's citation to Jansen does not overcome the deficiency of the Office Action's citation to Kan. Applicants respectfully submit that the proposed combination of the Office Action's citation to Kan with the Office Action's citation to Jansen fails to provide the required configuration, assuming, *arguendo*, that the combination of the Office Action's citation to Kan with the Office Action's citation to Jansen is proper.

Jansen discloses (column 3, line 58, to column 4, line 17) the retractable pin 72 in each guide portion 62 of the circuit board holder 46:

Referring generally to FIGS. 4-6, the pivotable circuit board holder 46 is pivotable to enable the circuit board 42 to be removed or installed from the front 58 or rear 60 of the device 40. The illustrated pivotable circuit board holder 46 has two guide portions 62 connected by a crossbar 64. Each guide portion 62 has a slot 66 for guiding and securing the circuit board 42 within the chassis 44. Additionally, each guide portion 62 has a pivoting pin 68. The pivotable circuit board holder 46 also has a securing assembly 70 that is operable to fix the pivotable circuit board holder 46 in a vertical position, as illustrated in FIG. 4, or allow the pivotable circuit board holder 46 to pivot to a horizontal position, as illustrated in FIG. 6.

When the pivotable circuit board holder 46 is fixed in the vertical position, a retractable pin 72 in each guide portion 62 is biased by a spring 74 into a portion of the chassis 44, or some other fixed surface within the chassis 44. Each retractable pin 72 is coupled by a connector 78 to a movable operator 80. The connector 78 may be a rigid member or a flexible wire. In the illustrated embodiment, the operators 80 are disposed within a housing 82 to guide the movement of the operators 80. To release the pivotable circuit board holder 46 from the vertical position, the operators 80 are squeezed together, as represented by the arrows 84. The inward movement of the operators 80 is coupled to the retractable pins 72, removing them from the portions 76 of the chassis 44 and compressing the springs 74. The pivotable circuit board holder 46 is now free to pivot about the pivoting pins 68.

The circuit board holder 46 that pivots to enable the circuit board 42 to be removed or installed fails to disclose a mounting pin that is directly mounted on a circuit board. Simply missing from the Office Action's citation to Kan is any mention of the one or more mounting pins that are directly mounted on the circuit board and connect the circuit board with the chassis, as recited in applicants' independent claim 1.

So, the Office Action's citation to Jansen fails to satisfy at least one of the limitations recited in applicants' independent claim 1.

The Office Action's citations to Kan and Jansen both fail to meet at least one of applicants' claimed features. For example, there is no teaching or suggestion in the Office Action's citations to Kan or Jansen of the one or more mounting pins that are directly mounted on the circuit board and connect the circuit board with the chassis, as recited in applicants' independent claim 1.

Furthermore, the Office Action does not allege that the art of record provides any teaching, suggestion, or incentive for modifying the citations to Kan and/or Jansen to provide the claimed configuration.

For all the reasons presented above with reference to claim 1, claims 1, 20, 28, and 30 are believed neither anticipated nor obvious over the art of record. The corresponding dependent claims are believed allowable for the same reasons as independent claims 1, 20, 28, and 30, as well as for their own additional characterizations.

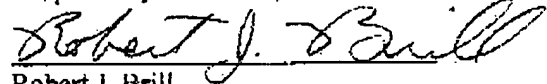
Withdrawal of the §§ 102 and 103 rejections is therefore respectfully requested.

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In view of the above amendments and remarks, allowance of all claims pending is respectfully requested. If a telephone conference would be of assistance in advancing the prosecution of this application, the Examiner is invited to call applicants' attorney.

Respectfully submitted,



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